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D: Remarks:

The previous amendment was made to point out the the claimed flex film interposer is an intergrated element providing a Land Grid Array (LGA) electrical connection disposed between a Multi-Chip Module (MCM) and the next level of integration of a Land Grid Array system and said flex film, wherein said interposer also provides means integral to said flex film interposer for implementing a desired Engineering Change (EC) and said flex film interposer also intergrally provides means for decoupling power to ground in the Land Grid Array structure to minimize switching activity effects on the Land Grid Array system when mounted on a system board between the system board and the Multi-Chip Module.

As we said in the prior response to the first office action the primary reference Tamarkin et al 6428327 provides (as the examiner intreprets this) 400/500 which is a not a chip to module interposer, and so does not provide a decoupling power to ground decoupling when mounted on a system board.

Furthermore we did say that 400/500 is not a flex film, but with the examiner's explanation we understand that 400/500 could be intrepreted as a flex film, but with that intrepretation Tamarkin still does not provide a power to ground decoupling when mounted on a system board.

400/500 of Tamarkin does not provide a decoupling power to ground decoupling when mounted on a system board, because in the reference there is no power reference metal shown or described in the text, and secondly, there is no means for decoupling power to ground to minimize switching activity effects.

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While some confusion appears in the rejection based on Tamarkin, the Examiner cited Column 4, line 18 as allowing decoupling, which of course it does not. The examiner appreciated that, and really referred to Chance 5177594 in the reference to Column 4, line 18, where chance does show two voltage distribution planes separated by decoupling capacitance layers. However, there is no suggestion in either reference that there be a combination as claimed, or even as the examiner has suggested.

Also, the interposer module of the Chance reference, as was remarked in the prior amendment, is not between the system board and the module, but only mounted on a chip ceramic interconnection substrate. Thus the combination of references suggested by the Examiner, done with hindsight, would still not meet the claims. The examiner's statement to the effect that I interpret something that is different (the ceramic interconnection substrate 54) as the same (as a system board) is not a proper ground for rejection.

Now, with respect to claim 4, the specification described on page 7 the insulated polymer plug. This plug is composed of two parts, 70 and 65. The plug body 70 and expansion pin 65 are both insulators, as they are both shown and described as insulators in the first paragraph of page 7, line 8, "This insulator plug.."

No reference shows the insulator plug as defined in Claim 4 with its expansion pin to allow the engineering changes to be made. The examiner in the rejection of Claim 4 under 35 USC 112 interpreted the claim as not being capable of insulating the plated through hole from the system board. The expansion pin is an insulator and the plug 70 is also an insulator which it expands with the expansion pin holds the plated through hole away

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from electrical contract with the system board, as shown and described.

Reconsider is requested at this time, and a notice of allowance is deemed appropriate.

RESPECTFULLY SUBMITTED

(For the inventors)

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